

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

*Dedicated to protecting and improving the health and
environment of the people of Colorado*

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Roy Romer
Governor

Patricia A. Nolan, MD, MPH
Executive Director

May 19, 1993

Mr. Richard J. Schassburger
U.S. Department of Energy
Rocky Flats Plant
Building 116
P. O. Box 928
Golden, Colorado 80402-0928



000016840

Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
999 18th Street, Suite 500, 8WM-c
Denver, Colorado 80202-2405

RE: Request for Schedule Extension, Phase I Draft and Final RFI/RI Reports, Solar
Evaporation Ponds (OU-4), dated May 4, 1993

Dear Sirs,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) acknowledges receipt of DOE's request for schedule extension for the subject reports.

The Division hereby grants DOE an extension of 79 working days for the submittal of the draft and final Phase I RFI/RI Reports for the OU-4, Solar Evaporation Ponds. The new milestone dates for these submittals are September 14, 1993 and February 14, 1994, respectively.
VS 4/17/93

VS. 9/17/94
The extension is based on our judgement that good cause exists for longer than anticipated radiological analysis, increased time for critical path elements needed to support the Baseline Risk Assessment, and increased time to construct vadose zone boreholes as required by the Division.

DOE's failure to meet IAG Table 6 milestones for the delivery of approvable documents and its failure to initiate procurement concurrent with the work plan approval process do not warrant schedule extension. We further reject DOE's assertions that unanticipated or unscheduled mobilization tasks, the designation of the Solar Evaporation Ponds as a Radiological Controlled Area, or logistic and security issues warrant schedule extension.

As required by the Interagency Agreement (IAG), Paragraph 223, "If the Lead Regulatory Agency does not concur in the requested extension, it shall include in its statement of nonconcurrence an explanation of the basis for its position." Attached is the Division's Statement of Nonconcurrence, prepared after consultation with the U. S. Environmental Protection Agency.



If you have any questions concerning the Division's comments, please call Harlen Ainscough of my staff at 692-3337.

Sincerely,



Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

Attachment

cc: Daniel S. Miller, AGO
Jackie Berardini, CDH-OE
Arturo Duran, EPA
Frazer Lockhart, DOE
Scott Surovchek, DOE
Steve Keith, EG&G
Wanda Busby, EG&G
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